

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re

CUSTOMS AND TAX ADMINISTRATION  
OF THE KINGDOM OF DENMARK  
(SKATTEFORVALTNINGEN) TAX  
REFUND SCHEME LITIGATION

MASTER DOCKET

18-md-2865 (LAK)

This document relates to: 18-cv-05053;  
18-cv-09797; 18-cv-09836; 18-cv-09837;  
18-cv-09838; 18-cv-09839; 18-cv-09840;  
18-cv-09841; 18-cv-10100.

**DECLARATION OF MARC A. WEINSTEIN**

I, Marc A. Weinstein, hereby declare as follows:

1. I am a partner at Hughes Hubbard & Reed LLP, counsel for Plaintiff Skatteforvaltningen (“SKAT”) in this action. I am fully familiar with the matters set forth in this Declaration.
2. I submit this Declaration in support of SKAT’s Memorandum of Law in Opposition to Defendants’ Motions to Dismiss the Amended Complaints.
3. Attached hereto as “Exhibit 1” is a true and correct copy of SKAT’s original complaint in *Skatteforvaltningen v. DW Construction, Inc. Retirement Plan & Stacey Kaminer*, No. 18-cv-09797.
4. Attached hereto as “Exhibit 2” is a true and correct copy of excerpts from the transcript of the May 14, 2020 deposition of defendant Alexander Jamie Mitchell III.

I, Marc A. Weinstein, hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
August 6, 2020

/s/ Marc A. Weinstein

Marc A. Weinstein